

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,  
SPRINT/UNITED MANAGEMENT  
COMPANY,  
T-MOBILE USA, INC., and  
CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS,

Defendants.

Civil Action No. 5:19-cv-75

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR ENTRY OF DISCOVERY ORDER**

Pursuant to the Court’s Order (Dkt. 34), Plaintiff Joe Andrew Salazar (“Salazar”) and Defendants AT&T Mobility LLC, Sprint/United Management Company, T-Mobile USA, Inc., And Cellco Partnership a/b/a Verizon Wireless (“Defendants”), (collectively, the “Parties”), submit their attached Discovery Order for the Court’s consideration. The proposed Discovery Order is agreed to, with the exception of a request by Plaintiff to use materials produced in *Salazar v. HTC Corporation*, 2:16-cv-01096-JRG (E.D.Tex.). Defendants oppose Plaintiff’s request for the reasons stated in the proposed Discovery Order.

Dated: October 31, 2019

Respectfully submitted,

/s/ Daruish Keyhani

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*/s/ Fred I. Williams*

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 31st day of October, 2019, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

*/s/ Fred I. Williams* \_\_\_\_\_